

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

WILLIAM E. DUGAN, <i>et al.</i> ,)	
)	
Plaintiffs,)	
)	CIVIL ACTION
vs.)	
)	NO. 08 C 2930
KLS SERVICES, INC.,)	
an Indiana corporation,)	JUDGE BLANCHE M. MANNING
)	
Defendant.)	

MOTION FOR ENTRY OF DEFAULT AND JUDGMENT

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, KLS SERVICES, INC., an Indiana corporation, in the total amount of \$41,131.20, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$952.50.

On July 31, 2008, the Summons and Complaint was served on the Registered Agent (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on August 20, 2008. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Cecilia M. Scanlon

CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 4th day of September 2008:

Mr. Sean Wilson, Registered Agent
KLS Services, Inc.
12550 Parrish Avenue
PO Box 506
Cedar Lake, IN 46303-0506

/s/ Cecilia M. Scanlon _____

Cecilia M. Scanlon
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